REMARKS

Introduction

Upon entry of the foregoing amendment, claims 1-4, 7, 9, 19-24, 27-29, and 31-82 are pending in the application without prejudice or disclaimer. Claims 1, 7, 19, 35, 37, 48, 63 and 64 have been amended. Claims 5-6, 8, 10-18, 25, 26, and 30 have been canceled. Claims 65-82 have been newly added. No new matter is being presented. In view of the following remarks, reconsideration and allowance of all the pending claims are requested.

Rejection under 35 USC §103

Claim 1 has been rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,757,034 to Yu (hereinafter "Yu") in view of U.S. Patent No. 5,973,664 to Badger (hereinafter "Badger"). In view of the following remarks, reconsideration and allowance of this claim are earnestly solicited.

Applicant has amended claim 1 in order to recite, among other things, "displaying the image rotated according to the pivot angle at a position close to the buttons."

On pages 2 and 3 of the Office Action, the Examiner acknowledges and Applicant agrees that Yu fails to teach or suggest "detecting a pivot angle of the image display apparatus, and displaying the image rotated according to the pivot angle." On page 3 of the Office Action, the Examiner contends that Badger describes "a sensor, which determined the current physical orientation and signal the operating system to change the orientation mode to compensate for the rotation (col. 5, lines 26-31)." The Examiner contends that "it would have been obvious to one having ordinary skill in the art at the time the invention was made to include pivot angle detection in Yu" and that "[o]ne would have been motivated to do so in order to accommodate the user with different orientation modes and providing the right image display for each alternative mode."

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Applicant respectfully submits that Yu and Badger, whether taken alone or in combination with one another, fail to teach or suggest, among other things, "displaying the image rotated according to the pivot angle at a position close to the buttons." In contrast, Badger describes at col. 5, lines 28-32 that computer display 216 has "a sensor which determines the current physical orientation and signals operating system 206 to change the orientation mode to compensate for the rotation." In other words, Badger describes changing the "orientation *mode*" (emphasis added). Applicant respectfully submits that this is distinctly different from "displaying" an image that is "rotated *according to the pivot angle* at a *position close to the buttons*" (emphasis added). At best, Badger describes at col. 4, lines 66 to col. 5, line 6 that an image 204 is displayable in a "number of orientations" based on "orientation modes" -- *but*, image 204 is entirely unrelated to an "image indicating functions" that is "assigned to the buttons" of a display. Thus, it is respectfully submitted that changing the "orientation mode" of the image 204 for display as illustrated and described by Badger is entirely different from Applicant's displaying an "image indicating functions" that are "assigned to the buttons" that is "rotated" according to a detected "pivot angle" at a "position close to the buttons." Moreover, as acknowledged by the Examiner on pages 2 and 3 of the Office Action, Yu fails to teach or suggest "displaying" an "image" indicating functions that are assigned to the buttons where the "image" is "rotated according to the pivot angle."

Since Yu and Badger, whether taken alone or in combination with one another, fail to teach or suggest every element as recited in Applicant's claim 1, claim 1 is patentably distinguishable and deemed to be allowable.

Accordingly, withdrawal of this rejection and allowance of this claim are earnestly solicited.

Rejection under 35 USC §103

Claims 2-4 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Yu in view of Badger and further in view of U.S. Patent No. 6,744,259 to Bald (hereinafter "Bald"). Applicant respectfully traverses these rejections for at least the following reasons.

With regard to claims 2-4, it is requested that for at least the reasons that these claims

depend from allowable independent claim 1, and therefore contain each of the features as recited in claim 1, claims 2-4 are also patentable over Yu, Badger, and Bald, whether taken alone or in combination with one another.

Accordingly, withdrawal of these rejections and allowance of these claims are earnestly solicited.

Rejection under 35 USC §103

Claims 7 and 9 have been rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,346,972 to Kim (hereinafter "Kim") in view of Bald (hereinafter "Bald"). In view of the following remarks, reconsideration and allowance of these claims are earnestly solicited.

With regard to independent claim 7, Applicant has amended this claim to recite, among other things, that "the graphics processing unit displays the image in the zones rotated according to the pivot angle at a position close to the buttons."

On page 5 of the Office Action, the Examiner acknowledges that Kim "does not explicitly disclose" a "controller which sets display parameters of the image display apparatus, has buttons for item selection, and performs operations assigned to the buttons," and that

> the image display unit has zones to display an image indicating functions assigned to the buttons, and the controller generates image information to be displayed in the zones and supplies the image information to the graphics processing unit, [and]

> the zones to display an image indicating functions assigned the buttons are displayed at a position on the image display apparatus close to the buttons.

On page 5 of the Office Action, the Examiner contends that Bald describes

> the image display unit has zones to display an image indicating functions assigned to the button, and the controller generates image information to be displayed in the zones and supplies the image information to the graphics processing unit ... (fig. 1, items 1-4), (col. 5, lines 36-44).

The Examiner contends that "it would have been obvious to one having ordinary skill in the art at the time the invention was made to have included Bald's features in Kim." The Examiner further contends that "[o]ne would have been motivated to do so in order to accommodate the user with a wide variety of menu selections and providing the right image display for each

alternative mode."

Applicant respectfully submits that Kim and Bald, whether taken alone or in combination with one another, fail to teach or suggest, among other things, "the image display unit has zones to display an image indicating functions assigned to the buttons, and the controller generates image information to be displayed in the zones and supplies the image information to the graphics processing unit." In contrast, Bald describes in col. 4, line 66 to col. 5, line 5 that the display screen 20 merely is a "display screen capable of displaying the menus and submenus" – Bald fails to teach or suggest anywhere that the display screen 20 has "zones" or that it displays "image information" in the "zones." At best, Bald merely illustrates in FIG. 3 and describes in col. 5, lines 39-45 that a "verification menu 30" is displayed and the menu "permits the user to select from among four types of test to be verified using up and down cursor control arrows activated by softkeys 1 and 2a select key activated by softkey 3, and an exit key activated by softkey 4," and not that the "verification menu 30" has "zones" for displaying "image information."

Applicant respectfully submits that Kim and Bald, whether taken alone or in combination with one another, fail to teach or suggest, among other things, "the graphics processing unit displays the image in the zones rotated according to the pivot angle at a position close to the buttons." In contrast, Kim illustrates in FIG. 10 and describes at col. 7, lines 51-56 that "if the user has turned the display panel 1100 by 90 degrees clockwise," the "letters and figures of the on-screen display 1104 are displayed in the normal manner as seen by the user." It is respectfully submitted that displaying the on-screen display 1104 "in the normal manner as seen by the user" after the display panel 1100 has been rotated by 90 degrees is distinctly different from Applicant's "display[ing] the image in the zones rotated according to the pivot angle *at a position close to the buttons*" (emphasis added). The orientation of the on-screen display 1104 after the display panel 110 has been rotated is unrelated to a "position close to the buttons" (i.e., keypad 1105 of the display panel 1100). Moreover, as discussed in detail above, Bald illustrates in FIG.1 and describes in col. 4, line 66 to col. 5, line 5 that the display screen 20 merely is a "display screen capable of displaying the menus and submenus" – Bald fails to teach or suggest anywhere that the display screen 20 has "zones" or that it displays an "image in the zones" that is "rotated according to the pivot angle" at a "position close to the buttons."

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Since Kim and Bald, whether taken alone or in combination with one another, fail to teach or suggest every element as recited in Applicant's claim 1, claim 1 is patentably distinguishable and deemed to be allowable.

With regard to claim 9, it is requested that for at least the reason that this claim depends from allowable independent claim 7, and therefore contains each of the features as recited in claim 7, claim 9 is also patentable over Kim and Bald, whether taken alone or in combination with one another.

Accordingly, withdrawal of these rejections and allowance of these claims are earnestly solicited.

Rejection under 35 USC §103

Claims 19-23 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Bald in view of Kim. In view of the following remarks, reconsideration and allowance of these claims are earnestly solicited.

Claim 19

Applicant has amended claim 19 to recite, among other things, that the "image display unit displays the image in the zones rotated according to the pivot angle at a position close to the buttons."

On page 6 of the Office Action the Examiner contends that Bald describes "an image display unit including zones to display an image indicating function assigned to the buttons; (fig. 1, items 1-4)."

Applicant respectfully submits that Bald and Kim, whether taken alone or in combination with one another, fail to teach or suggest, among other things, "an image display unit including zones to display an image indicating functions assigned to the buttons." In contrast, Bald describes in col. 4, line 66 to col. 5, line 5 that the display screen 20 merely is a "display screen capable of displaying the menus and submenus" – Bald fails to teach or suggest anywhere that the display screen 20 has "zones." At best, Bald merely illustrates in FIG. 3 and describes in

col. 5, lines 39-45 that a "verification menu 30" is displayed and the menu "permits the user to select from among four types of test to be verified using up and down cursor control arrows activated by softkeys 1 and 2a select key activated by softkey 3, and an exit key activated by softkey 4," and not that the verification menu 30 displayed on display screen 20 has "zones."

Applicant respectfully submits that Bald and Kim, whether taken alone or in combination with one another, fail to teach or suggest, among other things, "image display unit displays the image in the zones rotated according to the pivot angle at a position close to the buttons." As discussed in detail above, Bald illustrates in FIG.1 and describes in col. 4, line 66 to col. 5, line 5 that the display screen 20 merely is a "display screen capable of displaying the menus and submenus" – Bald fails to teach or suggest anywhere that the display screen 20 has "zones" or that it displays an "image in the zones" that is "rotated according to the pivot angle" at a "position close to the buttons."

Kim illustrates in FIG. 3 and describes at col. 5, lines 8-11 "a pivot controller 840 for outputting storing position control signals 841 and data selection control signals 842 in response to pivot control signals 212 from the controller 200." Applicant respectfully submits that "outputting storing position control signals 841 and data selection control signals 842" in response to pivot control signals 212 as described by Kim is entirely different from Applicant's "image display unit" that displays an "image in the zones" that is "rotated according to the pivot angle" and "at a *position close to the buttons*" (emphasis added).

Kim illustrates in FIG. 10 and describes at col. 7, lines 51-56 that "if the user has turned the display panel 1100 by 90 degrees clockwise," the "letters and figures of the on-screen display 1104 are displayed in the normal manner as seen by the user." It is respectfully submitted that displaying the on-screen display 1104 "in the normal manner as seen by the user" after the display panel 1100 has been rotated by 90 degrees is distinctly different from Applicant's "display[ing] the image in the *zones*" that are "rotated according to the pivot angle *at a position close to the buttons*" (emphasis added). The orientation of the on-screen display 1104 after the display panel 110 has been rotated is unrelated to a "position close to the buttons" (i.e., keypad 1105 of the display panel 1100).

Since Bald and Kim, whether taken alone or in combination with one another, fail to teach or suggest every element as recited in Applicant's claim 19, claim 19 is patentably

distinguishable and deemed to be allowable.

Accordingly, withdrawal of this rejection and allowance of this claim are earnestly solicited.

Claims 20-23

With regard to claims 20-23, it is requested that for at least the reasons that these claims depend from allowable independent claim 19, and therefore contain each of the features as recited in claim 19, claims 20-23 are also patentable over Bald, whether taken alone or in combination with one another.

Accordingly, withdrawal of these rejections and allowance of these claims are earnestly solicited.

Rejection under 35 USC §103

Claim 24 has been rejected under 35 U.S.C. §103(a) as being unpatentable over Bald in view of Kim and further in view of U.S. Patent No. 6,356,287 to Ruberry et al. (hereinafter "Ruberry"). Applicant respectfully traverses this rejection for at least the following reasons.

With regard to claim 24, it is requested that for at least the reason that this claim depends from allowable independent claim 19, and therefore contains each of the features as recited in claim 19, claim 24 is also patentable over Bald, Kim, and Ruberry, whether taken alone or in combination with one another.

Accordingly, withdrawal of this rejection and allowance of this claims are earnestly solicited.

Rejection under 35 USC §103

Claims 27-34 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Bald in view of Yu. Applicant respectfully traverses these rejections for at least the following reasons.

Claim 27

On page 9 of the Office Action, the Examiner acknowledges and Applicant agrees that Bald fails to teach or suggest "generating sub-functions of at least one of the first and second buttons according to the generated first and second function." The Examiner contends that Yu describes "OSD software to display menu functions and sub functions respective to indicative symbols and buttons (fig. 3)." The Examiner further contends that "it would have been obvious to one having ordinary skill in the art at the time the invention was made to include Yu sub-function feature[s] in Bald. One would have been motivated to do so in order to optimize screen real estate."

Applicant respectfully submits that Bald and Yu, whether taken alone or in combination with one another, fail to teach or suggest, among other things, "generating sub-functions of at least one of the first and second buttons according to the generated first and second function." In contrast, Yu describes in col. 3, lines 4-7 that "a user of the flat panel display 10 presses any one of the control buttons 102, which automatically drives the OSD software to display the indicating symbols 302 (see FIG. 3) on the display screen 300" and that the "indicating symbols 302 respectively indicate functions and positions of the function buttons 102 and the power switch button 101." Yu illustrates in FIG. 3 and describes in col. 3, lines 18-33 a "volume adjustment bar 303 appears near the indicating symbols 302" on the flat panel display 10 after the user "presses the second function button 106" thereby selecting to "adjust the volume of the speakers 202." Yu further describes in col. 3, lines 18-33 that

> [g]uided by the indicating symbols 302, the user can press the adjusting buttons 104, 105 to adjust the volume of the speakers 202. When the adjusting button 104 is pressed, the darkened position of the volume adjustment bar 303 extends rightward, and the volume of the speakers 202 is progressively turned up. When the adjusting button 105 is pressed, the adjustment bar 303 recedes leftward, and the speakers 202 are progressively turned down. When the second function button 106 is pressed a second time, the volume adjustment bar 303 disappears. The adjusted speak volume result is stored automatically.

In other words, Yu merely describes displaying and controlling a function such as "volume adjustment," and fails to teach or suggest "generating *sub-functions* of at least one of the first and second buttons *according to the generated first and second function*" (emphasis added). At best, Yu describes that the user "presses the second function button 106" thereby selecting to

"adjust the volume of the speakers 202" and that "the user can press the adjusting buttons 104, 105 to adjust the volume," *not* "generating sub-functions "according to the "generated first and second function." There is no generated "sub-function" associated with the "volume adjustment" described by Yu, where the generated sub-function is *according* to a "generated first and second function."

Since Bald and Yu, whether taken alone or in combination with one another, fail to teach or suggest every element as recited in Applicant's claim 27, claim 27 is patentably distinguishable and deemed to be allowable.

Accordingly, withdrawal of this rejection and allowance of this claim are earnestly solicited.

Claims 28-34

With regard to claims 28-34, it is requested that for at least the reasons that these claims depend from allowable independent claim 27, and therefore contain each of the features as recited in claim 27, claims 28-34 are also patentable over Bald and Yu, whether taken alone or in combination with one another.

Accordingly, withdrawal of these rejections and allowance of these claims are earnestly solicited.

Rejection under 35 USC §103

Claims 35-36 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Bald in view of Yu and further in view of Kim. In view of the following remarks, reconsideration and allowance of these claims are earnestly solicited.

With regard to independent claim 35, Applicant has amended this claim to recite, among other things, that "the image display apparatus displays the image rotated according to the pivot angle at a position close to the at least one button."

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On pages 10-11 of the Office Action, the Examiner contends that <u>Bald</u> describes a "controller" to "generate image information to be displayed in the zones (fig. 1, items 1-4)." On page 11 of the Office Action, the Examiner contends that <u>Yu</u> describes "a graphics processing unit to process at least one function of the respective at least one button to be displayed on the screen at a position corresponding to the at least one button (fig. 3)." The Examiner further contends that <u>Kim</u> describes

> a pivot detector to detect a pivot angle of the image display unit and to provide the pivot angle detected to the graphics processing unit such that the graphics processing unit supplies an image to the image display unit at a same pivot point angle as the image display unit at a same pivot angle as the image display unit (col. 5, lines 8-11 and fig. 3).

Applicant respectfully submit that <u>Bald</u>, <u>Yu</u> and <u>Kim</u>, whether taken alone or in combination with one another, fail to teach or suggest, among other things, that "the image display unit displays the image rotated according to the pivot angle at a position close to the at least one button." In contrast, <u>Bald</u> illustrates in FIG. 1 and describes in col. 4, line 66 to col. 5, line 5 that the display screen 20 merely is a "display screen capable of displaying the menus and submenus" – <u>Bald</u> fails to teach or suggest anywhere that the display screen 20 has "zones." At best, <u>Bald</u> merely illustrates in FIG. 3 and describes in col. 5, lines 39-45 that a "verification menu 30" is displayed and the menu "permits the user to select from among four types of test to be verified using up and down cursor control arrows activated by softkeys 1 and 2a select key activated by softkey 3, and an exit key activated by softkey 4," and not that the verification menu 30 displayed on display screen 20 has "zones."

As acknowledged by the Examiner on pages 2 and 3 of the Office Action, <u>Yu</u> fails to teach or suggest "displaying" an "image" indicating functions that are assigned to the buttons where the "image" is "rotated according to the pivot angle."

<u>Kim</u> illustrates in FIG. 3 and describes at col. 5, lines 8-11 "a pivot controller 840 for outputting storing position control signals 841 and data selection control signals 842 in response to pivot control signals 212 from the controller 200." Applicant respectfully submits that "outputting storing position control signals 841 and data selection control signals 842" in response to pivot control signals 212 as described by <u>Kim</u> is entirely different from Applicant's "image display unit" that displays an "image in the zones" that is "rotated according to the pivot

angle" and "at a *position close to the buttons*" (emphasis added). Kim illustrates in FIG. 10 and describes at col. 7, lines 51-56 that "if the user has turned the display panel 1100 by 90 degrees clockwise," the "letters and figures of the on-screen display 1104 are displayed in the normal manner as seen by the user." It is respectfully submitted that displaying the on-screen display 1104 "in the normal manner as seen by the user" after the display panel 1100 has been rotated by 90 degrees is distinctly different from Applicant's "display[ing] the image in the zones rotated according to the pivot angle *at a position close to the buttons*" (emphasis added). The orientation of the on-screen display 1104 after the display panel 110 has been rotated is unrelated to a "position close to the buttons" (i.e., keypad 1105 of the display panel 1100).

Applicant respectfully submits that amended claim 35 is patentably distinguishable from Bald, Yu, and Kim, whether taken alone or in combination with one another, and is therefore deemed to be allowable.

With regard to claim 36, it is requested that for at least the reason that this claim depends from allowable independent claim 35, and therefore contains each of the features as recited in claim 35, claim 36 is also patentable over Bald, Yu, and Kim, whether taken alone or in combination with one another.

Accordingly, withdrawal of these rejections and allowance of claim 35 are earnestly solicited.

Rejection under 35 USC §103

Claims 37-63 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Yu in view of Pivot Pro Software (hereinafter "Pivot Pro") and further in view of Kim. In view of the following remarks, reconsideration and allowance of these claims are earnestly solicited.

Claim 37

Applicant has amended claim 37 to recite, among other things, that

at least one symbol is displayed which is respectively assigned to the at least
one input unit, and wherein the orientation of the at least one symbol is changed

in accordance with the result of the detector unit, and the at least one symbol, whose orientation is changed, is displayed at a position close to the at least one input unit.

On page 12 of the Office Action, the Examiner contends that Pivot Pro describes "a detector unit to detect whether the device is in a portrait mode or in a landscape mode (p. 1, para. [001])."

Applicant respectfully submits that Yu, Pivot Pro, and Kim, whether taken alone or in combination with one another, fail to teach or disclose, among other things, "a detector unit to detect whether the device is in a portrait mode or in a landscape mode." In contrast, Pivot Pro describes at page 1, paragraph 1 "software" that "lets you rotate your computer display from landscape to portrait position" – not "a detector unit" to "*detect*" (emphasis added) whether the device is in a "portrait mode or in a landscape mode." Applicant respectfully submits that Pivot Pro fails to teach or suggest a "a detector unit" to "detect" a "portrait mode or in a landscape mode" *anywhere*.

On page 13 of the Office Action, the Examiner contends that Kim describes that "at least one symbol is displayed which is respectively assigned to the at least one input unit, and wherein the orientation of the at least one symbol is changed in accordance with the result of the detector unit (col. 7, lines 51-55) and (fig. 10)."

Applicant respectfully submits that Yu, Pivot Pro, and Kim, whether taken alone or in combination with one another, fail to teach or disclose, among other things,

that

> at least one symbol is displayed which is respectively assigned to the at least one input unit, and wherein the orientation of the at least one symbol is changed in accordance with the result of the detector unit, and the at least one symbol, whose orientation is changed, is displayed at a position close to the at least one input unit.

In contrast, Kim illustrates in FIG. 10 and describes at col. 7, lines 51-56 that "if the user has turned the display panel 1100 by 90 degrees clockwise," the "letters and figures of the on-screen display 1104 are displayed in the normal manner as seen by the user." It is respectfully submitted that displaying the on-screen display 1104 "in the normal manner as seen by the user" after the display panel 1100 has been rotated by 90 degrees is distinctly different from

Applicant's "at least one symbol" whose "orientation is changed," is "displayed *at a position close to the at least one input unit*" (emphasis added). The orientation of the on-screen display 1104 after the display panel 110 has been rotated is unrelated to a "position" that is "close" to the "input unit" (i.e., keypad 1105 of the display panel 1100).

Since Yu, Pivot Pro, and Kim, whether taken alone or in combination with one another, fail to teach or suggest every element as recited in Applicant's claim 37, claim 37 is patentably distinguishable and deemed to be allowable.

Accordingly, withdrawal of this rejection and allowance of this claim are earnestly solicited.

Claim 38-47

With regard to claims 38-47, it is requested that for at least the reasons that these claims depend from allowable independent claim 37, and therefore contain each of the features as recited in claim 37, claims 38-47 are also patentable over Yu, Pivot Pro, and Kim, whether taken alone or in combination with one another.

Accordingly, withdrawal of these rejections and allowance of these claims are earnestly solicited.

Claim 48

Applicant has amended claim 48 to recite, among other things, that "changing an orientation of the at least one symbol" includes "displaying the at least one symbol, whose orientation is changed, at a position close to the at least one input unit."

On page 15 of the Office Action, the Examiner contends that Pivot Pro describes "detecting a rotated state of the display device (p. 1, para. [001])."

Applicant respectfully submits that Yu, Pivot Pro, and Kim, whether taken alone or in combination with one another, fail to teach or suggest, among other things, "detecting a rotated state of the display device." In contrast, Pivot Pro describes at page 1, paragraph 1 "software" that "lets you rotate your computer display from landscape to portrait position" — not "*detecting*"

(emphasis added) a "rotated state of the display device." Applicant respectfully submits that Pivot Pro fails to teach or suggest "detecting" a "rotated state of the display device" *anywhere.*

On page 15 of the Office Action, the Examiner contends that Pivot Pro describes "changing an orientation of the at least one symbol according to the detection of the rotated state of the display device (p. 1, para. [001])." The Examiner also contends that Yu describes "displaying at least one symbol on a screen, the symbol indicative of a function to control the display device, the at least one symbol being assigned to the at least one input unit (fig. 3)," and that Kim describes "controlling the function of the display upon actuation of the at least one input unit (col. 6, lines 10-15)."

Applicant respectfully submits that Yu, Pivot Pro, and Kim, whether taken alone or in combination with one another, fail to teach or suggest, among other things, "changing an orientation of the at least one symbol" includes "displaying the at least one symbol, whose orientation is changed, at a position close to the at least one input unit." In contrast, Pivot Pro describes at p. 1, paragraph 1 that "software ... lets you rotate your computer display from landscape to portrait position" – not that "changing an orientation" of at least one "symbol" includes "displaying the at least one symbol, whose orientation is changed, at *a position close to the at least one input unit*" (emphasis added). Kim illustrates in FIG. 10 and describes at col. 7, lines 51-56 that "if the user has turned the display panel 1100 by 90 degrees clockwise," the "letters and figures of the on-screen display 1104 are displayed in the normal manner as seen by the user." It is respectfully submitted that displaying the on-screen display 1104 "in the normal manner as seen by the user" after the display panel 1100 has been rotated by 90 degrees is distinctly different from Applicant's "at least one symbol" whose "orientation is changed," is "displayed *at a position close to the at least one input unit*" (emphasis added). The orientation of the on-screen display 1104 after the display panel 110 has been rotated is unrelated to a "position" that is "close" to the "input unit" (i.e., keypad 1105 of the display panel 1100). Moreover, as acknowledged by the Examiner on pages 2 and 3 of the Office Action, Yu fails to teach or suggest "displaying" an "image" indicating functions that are assigned to the buttons where the "image" is "rotated according to the pivot angle."

Since Yu, Pivot Pro, and Kim, whether taken alone or in combination with one another, fail to teach or suggest every element as recited in Applicant's claim 37, claim 37 is patentably distinguishable and deemed to be allowable.

Accordingly, withdrawal of this rejection and allowance of this claim are earnestly solicited.

Claims 49-62

With regard to claims 49-62, it is requested that for at least the reasons that these claims depend from allowable independent claim 48, and therefore contain each of the features as recited in claim 48, claims 49-62 are also patentable over Yu, Pivot Pro, and Kim, whether taken alone or in combination with one another.

Accordingly, withdrawal of these rejections and allowance of these claims are earnestly solicited.

Claim 63

Applicant has amended claim 63 to recite, among other things, that "changing an orientation of the at least one symbol" includes "displaying the at least one symbol, whose orientation is changed, at a position close to the at least one input unit."

On page 18 of the Office Action, the Examiner contends that Yu describes "displaying at least on symbol on a screen, the symbol indicative of a function to control the display device, the at least one symbol being assigned to the at least one input unit (fig. 3)." The Examiner contends that Pivot Pro describes "changing an orientation of the at least one symbol in accordance with an information indicative of a viewing state of the screen, in which the viewing state relates to a rotated state of the screen (p. 1, para. [001]." The Examiner further contends that Kim describes "controlling the function of the display device upon actuation of the at least one input unit (col. 7, lines 58-60)."

Applicant respectfully submits that Yu, Pivot Pro, and Kim, whether taken alone or in combination with one another, fail to teach or suggest, among other things, "changing an orientation of the at least one symbol in accordance with a detection of a viewing state of the screen, in which the viewing state relates to a rotated state of the screen." In contrast, Pivot Pro describes at page 1, paragraph 1 "software" that "lets you rotate your computer display from

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landscape to portrait position, making documents, e-mail and web browsing easier to manage" – not "changing an orientation" of at least one "symbol" in accordance with a "*detection* of a viewing state of the screen, in which the viewing state relates to a rotated state of the screen" (emphasis added). Applicant respectfully submits that Pivot Pro fails to teach or suggest anywhere a "*detection* of a viewing state" (emphasis added) of a screen.

Applicant respectfully submits that Yu, Pivot Pro, and Kim, whether taken alone or in combination with one another, fail to teach or suggest, among other things, "changing an orientation of the at least one symbol" includes "displaying the at least one symbol, whose orientation is changed, **at a position close to the at least one input unit**" (emphasis added) for at least the same reasons as discussed above in connection with claim 48.

Since Yu, Pivot Pro, and Kim, whether taken alone or in combination with one another, fail to teach or suggest every element as recited in Applicant's claim 63, claim 63 is patentably distinguishable and deemed to be allowable.

Accordingly, withdrawal of this rejection and allowance of this claim are earnestly solicited.

Rejection under 35 USC §103

Claim 64 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Yu in view of Bald. In view of the following remarks, reconsideration and allowance of this claim are earnestly solicited.

Applicant has amended claim 64 to recite, among other things, "changing an orientation of the at least one symbol in accordance with a detection of a viewing state of the screen, in which the viewing state relates to a rotated state of the screen," and that "changing an orientation of the at least one symbol" includes "displaying the at least one symbol, whose orientation is changed, at a position close to the at least one input unit."

Applicant respectfully submits that Yu and Bald, whether taken alone or in combination with one another, fail to teach or suggest, among other things, "changing an orientation of the at least one symbol in accordance with a detection of a viewing state of the screen, in which the viewing state relates to a rotated state of the screen." In contrast, on page 18 of the Office

Action, the Examiner acknowledges that Yu fails to teach or suggest, among other things, "changing an orientation of the at least one symbol in accordance with a detection of a viewing state of the screen, in which the viewing state relates to a rotated state of the screen," and Applicant respectfully submits that Bald fails to make up for this deficiency.

On page 19 of the Office Action, the Examiner contends that Yu describes "displaying at least one symbol on the screen, the at least one symbol indicative of a function to control the display device, the at least one symbol being assigned to the at least one input unit (fig. 3)," and "controlling the function of the display device upon actuation of the at least one input unit (fig. 3, item 103), the at least one input unit disposed near the at least one symbol (fig. 3, item 303)."

Applicant respectfully submits that Yu and Bald, whether taken alone or in combination with one another, fail to teach or suggest, among other things, "changing an orientation of the at least one symbol" includes "displaying the at least one symbol, whose orientation is changed, at a position close to the at least one input unit." As acknowledged by the Examiner on pages 2 and 3 of the Office Action, Yu fails to teach or suggest "displaying" an "image" indicating functions that are assigned to the buttons where the "image" is "rotated according to the pivot angle." As such, Applicant submits that Yu fails to teach or suggest that indicating symbols 302 illustrated in FIG. 3 of Yu *change orientation*, or that these symbols with the changed orientation are "***at a position close to the at least one input unit***" (emphasis added) as in Applicant's claimed invention.

Since Yu and Bald, whether taken alone or in combination with one another, fail to teach or suggest every element as recited in Applicant's claim 64, claim 64 is patentably distinguishable and deemed to be allowable.

Accordingly, withdrawal of this rejection and allowance of this claim are earnestly solicited.

New Claims

Claims 65-82 have been newly added.

New dependent claim 65 recites, among other things, the method of claim 1, wherein at

least one of the image and an OSD menu having selectable items to adjust display parameters of the image display apparatus is displayed, when any one of the buttons is pushed. New dependent claim 66 recites, among other things, the method of claim 1, wherein the buttons are disposed on a front frame of the display apparatus.

New dependent claim 67 recites, among other things, the method of claim 7, wherein at least one of the image and an OSD menu having selectable items to adjust the display parameters of the image display apparatus is displayed, when any one of the buttons is pushed. New dependent claim 68 recites, among other things, the method of claim 7, wherein the buttons are disposed on a front frame of the display apparatus.

New dependent claim 69 recites, among other things, the method of claim 19, wherein at least one of the image and an OSD menu having selectable items to adjust the display parameters of the image display apparatus is displayed, when any one of the buttons is pushed. New dependent claim 70 recites, among other things, the method of claim 19, wherein the buttons are disposed on a front frame of the display apparatus.

New dependent claim 71 recites, among other things, the method of claim 27, wherein the generating of the one of the first functions comprises displaying the one of the first functions and the one of the second functions on corresponding zones of the screen, when any one of the buttons is pushed. New dependent claim 72 recites, among other things, the method of claim 27, wherein the buttons are disposed on a front side of the frame.

New dependent claim 73 recites, among other things, the method of claim 35, wherein at least one of the image and an OSD menu having selectable items to adjust the display parameters of the screen is displayed, when at least one button is pushed. New dependent claim 74 recites, among other things, the method of claim 35, wherein the at least one button is disposed on a front frame of the display apparatus.

New dependent claim 75 recites, among other things, the method of claim 37, wherein at least one of the at least one symbol and an OSD menu having selectable items to adjust display parameters of the screen is displayed when the at least one input unit is actuated. New dependent claim 76 recites, among other things, the method of claim 37, wherein the at least one input unit is disposed on a front frame of the display apparatus.

New dependent claim 77 recites, among other things, the method of claim 48, wherein at least one of the at least one symbol and an OSD menu having selectable items to adjust display

parameters of the screen is displayed when the at least one input unit is actuated. New dependent claim 78 recites, among other things, the method of claim 48, wherein the at least one input unit is disposed on a front frame of the display apparatus.

New dependent claim 79 recites, among other things, the method of claim 63, wherein at least one of the at least one symbol and an OSD menu having selectable items to adjust display parameters of the screen is displayed when the at least one input unit is actuated. New dependent claim 80 recites, among other things, the method of claim 63, wherein the at least one input unit is disposed on a front frame of the display apparatus.

New dependent claim 81 recites, among other things, the method of claim 64, wherein at least one of the at least one symbol and an OSD menu having selectable items to adjust display parameters of the screen is displayed when the at least one input unit is actuated. New dependent claim 82 recites, among other things, the method of claim 64, wherein the at least one input unit is disposed on a front frame of the display apparatus.

Applicant respectfully submits that support for newly added claims 65-82 may be found, e.g., in FIGS. 2-10, and the corresponding portions of the detailed description. Accordingly, it is respectfully submitted that new claims 65-82 do not present new matter, and are allowable over the prior art of record for at least the same reasons that claims 1-64 are patentable. Allowance of these claims is earnestly solicited.

Conclusion

It is respectfully submitted that a full and complete response has been made to the outstanding Office Action and, as such, there being no other objections or rejections, this application is in condition for allowance, and a notice to this effect is earnestly solicited.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided below.

If any further fees are required in connection with the filing of this amendment, please charge the same to our Deposit Account No. 502827.

Respectfully submitted,

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